

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

NEXTGEAR CAPITAL, INC.,

Plaintiff,

v.

CNG AUTO GROUP, INC. d/b/a TOP
WHEELS; ELONTO R. HERNANDEZ COLON;
and JULISSA M. FUENTES RIVERA,

Defendants.

CIVIL NO. 15-1824 (JAG)

Breach of Contract,
Collection of Monies,
Repossession of Personal Property

INFORMATIVE MOTION
AND REQUEST FOR EXTENSION OF TIME

TO THE HONORABLE COURT:

COMES NOW Plaintiff NextGear Capital, Inc. ("NextGear"), through the undersigned attorneys, and respectfully states and prays as follows:

1. On October 24, 2014, Popular Auto, LLC ("Popular Auto") filed a Motion to Intervene (Docket No. 52) and any response thereto is due today.
2. The undersigned reached out to counsel for Popular Auto and, today, the parties came to an agreement that will moot the intervention.
3. Thus, pursuant to the parties' agreement, the undersigned expect Popular Auto to withdraw its intervention within the next week.
4. However, in the unlikely event that the referenced agreement falls through, NextGear preventively requests an extension of time until November 23rd to file a response to Docket No. 52.

WHEREFORE NextGear respectfully prays that the Honorable Court take note of the above and, pursuant to Local Rule 6, grant an extension of time up to and including November 23, 2016, to respond to Docket No. 52.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 10th day of November, 2016.

McConnell Valdés LLC

Attorneys for Plaintiff
NextGear Capital, Inc.
270 Muñoz Rivera Avenue
San Juan, Puerto Rico 00918
P.O. Box 364225
San Juan, PR 00936-4225
Tel.: 787.250.5604
Fax: 787.759.2772
www.mcvpr.com

By: s/ Antonio A. Arias
Antonio A. Arias
USDC-PR No. 204906
aaa@mcvpr.com

By: s/ Sonia M. López del Valle
Sonia M. López del Valle
USDC-PR No. 231413
sld@mcvpr.com